

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PETER HAUGE,

Plaintiff,

-against-

**TRANSUNION, LLC, EQUIFAX
INFORMATION SERVICES, LLC, EXPERIAN
INFORMATION SOLUTIONS, INC. and
AMERIHOME MORTGAGE COMPANY, LLC,**

Defendants.

**Civil Case Number:
4:19-cv-40032-TSH**

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE Plaintiff, Peter Hauge, by his undersigned counsel, hereby moves the Court for an Order, pursuant to FRCP 37, compelling Defendant Amerihome Mortgage Company, LLC to produce discovery properly sought in this action.

This motion will be based on this Notice of Motion, the Memorandum of Law in Support, the Declaration of Yitzchak Zelman, Esq. and the Exhibits annexed thereto, along with the pleadings filed in this action and such other oral or documentary evidence as may be made at the hearing of this Motion.

LOCAL RULE 37.1 CERTIFICATION

On July 13, 2020, Plaintiff's counsel called Defendant's counsel to meet and confer regarding the issues raised in this Motion, leaving a voicemail. Plaintiff's counsel then followed up with an email on that same date, asking for Defendant's counsel's availability to meet-and-confer. Defendant's counsel responded on that same date, stating that Defendant intended to stand on its objections to the discovery demands. Plaintiff's counsel then offered a compromise, asking if Amerihome would simply stipulate as to the amount of their net worth, in order to avoid motion

practice. On July 14, 2020, Amerihome's counsel advised that Amerihome would not agree to such a stipulation, thereby necessitating the instant motion. The issue was further discussed during the parties' Rule 37 meet and confer phone call on July 14, 2020.

Dated: July 18, 2020

MARCUS & ZELMAN, LLC

/s/ Yitzchak Zelman

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